

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

Case No. 18-cv-00068

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, *et al.*,

Defendant-Intervenors.

**FEDERAL DEFENDANTS' UNOPPOSED MOTION TO EXTEND
DEADLINE TO RESPOND TO DEFENDANT-INTERVENORS'
RESPONSES AND CROSS MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Rule LR7.8, Federal Defendants hereby move to extend the deadline to file a response to Defendant-Intervenors' responses to Plaintiffs' Motion for Summary Judgment and Perez Defendant-Intervenors' cross motion for summary judgment, filed on November 6, 2020, until November 20, 2020.

Plaintiff States filed their Motion for Summary Judgment on October 9, 2020. *See* ECF 486. On November 6, 2020, Federal Defendants, Perez Defendant-Intervenors, and New Jersey Defendant-Intervenors filed responses. *See* ECF 501, 502, 504. Pursuant to this Court's Order, the parties' current response deadline to these filings is November 13, 2020. *See* ECF 473, 482.

Federal Defendants require an additional seven days given the need to consider responses to two response briefs, each more than double the permitted page count, as well as a cross motion for summary judgment, filed with numerous exhibits and declarations. This extension will have no impact on other deadlines in this matter.

Counsel for Plaintiffs and Perez Defendant-Intervenors have indicated their intention to seek the same seven-day extension for their respective response deadlines and do not oppose this requested extension. New Jersey Defendant-Intervenors do not oppose this requested extension.

CONCLUSION

For the reasons stated, Federal Defendants request this Court grant a seven-day extension of the deadline to respond to Defendant-Intervenors' response briefs, up to and including November 20, 2020.

Dated: November 9, 2020

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Respectfully submitted,

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Attorneys for Federal Defendants

CERTIFICATE OF CONFERENCE

I hereby certify on November 9, 2020, I conferred with counsel for the other parties. Plaintiffs, the Perez Defendant-Intervenors, and New Jersey Defendant-Intervenors do not oppose the requested relief.

/s/ James J. Walker
JAMES J. WALKER

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2020, I electronically filed the foregoing with the Clerk of the Court by using the Court's CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ James J. Walker
JAMES J. WALKER

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, et. al.,,

Plaintiffs,

v.

KIRSTJEN M. NIELSEN, *et al.*,

Defendants.

Case No. 8-cv-00068

**[PROPOSED] ORDER GRANTING FEDERAL DEFENDANTS'
UNOPPOSED MOTION TO EXTEND DEADLINE TO
RESPOND TO DEFENDANT-INTERVENORS' RESPONSES
AND CROSS MOTION FOR SUMMARY JUDGMENT**

WHEREFORE, at the request of counsel for Federal Defendants, and without opposition of Plaintiffs or Defendant-Intervenors,

IT IS HEREBY ORDERED that the deadline for Federal Defendants to respond to Defendant-Intervenors' responses to Plaintiffs' Motion for Summary Judgment and Perez Defendant-Intervenors' cross motion for summary judgment, is hereby extended by seven days to November 20, 2020.

SO ORDERED.

Signed on November ___, 2020, at Brownsville, TX.

Honorable Andrew S. Hanen
United States District Judge